

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region III, Annapolis Field Office

ORIGINAL  
(Red)

SEMS DocID  
2334585

DATE: May 28, 1980

SUBJECT: Hazardous Waste Site Inspection Report for: Liquid Waste Disposal, Inc.,  
Richfood Road, P.O. Box 7217, Richmond, VA - Phone 804/355-2563

FROM: George H. Houghton (3SA21)  
Engineering Technician

TO: Jeffrey Hass (3SA30)  
Acting Chief, Environmental Emergency Branch

THRU: Orterio Villa, Jr. (3SA20)  
Director, Annapolis Field Office

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The subject facility was inspected on March 20, 1980 and sampled on April 9, 1980 by George H. Houghton and Ronald Jones from EPA/Annapolis. Liquid Waste Disposal is on the Eckhardt List as site number 3214. Mr. G.C. Kirkmyer is the owner and met with the inspectors on April 9, 1980. He also accepted and signed the TSCA Notice of Inspection. A worker, Mr. Harold Bailey, was also present. Mr. Kirkmyer also stated that he did not want a duplicate set of samples taken by EPA. The inspector first tried to inspect the facility on March 20, 1980. Several attempts were made to contact the owner but the only contact was with his answering service. The inspectors then proceeded to the waste disposal site and found the gate locked. Several pictures were taken and the inspectors left the premises. The next day on March 21, 1980 Mr. Kirkmyer called the inspector in Annapolis and indicated he was out of town. Arrangements were then made for the inspection on April 9, 1980.

The inspectors met Mr. Kirkmyer on April 9, 1980 at about 0900, presented their credentials and Notice of Inspection. The waste liquid for the most part arrives on site by a Liquid Waste Disposal (LWD) tank truck. The material is pumped into an eighteen thousand gallon mechanically agitated storage tank. The mixed liquid is then piped to the incinerator. The burner is propane fired with a flame temperature ranging from 2200°F to 2600°F according to Mr. Kirkmyer. The liquid

feed rate to the incinerator is about 600 gph to 900 gph.

Several drums were observed outside the fence, at least one of these drums was full and seeping a dark viscous liquid into a drainage ditch. All the other drums were stored inside the compound. Mr. Kirkmyer stated that about 25 drums were dumped at his facility one night. He moved these drums inside the compound. The drums are not labeled, some were expanded, and the contents are unknown. The other drums on site, numbering about 150, were for the most part unlabeled and appeared to be ruptured or rusty to the point of leaking.

Drums are not normally accepted by LWD except for glue. Sometimes an unburnable material is received. Mr. Kirkmyer stated he had some drums of rancid peanut butter on hand. Other nonburnable material included tobacco waste and plastic bags. Empty drums are sent to a drum reclaimer.

The incinerator is a horizontal cylinder about 5 feet in diameter with a propane burner at one end. There is no stack on the incinerator; the combusted byproducts are emitted from the end of the unit with the fumes rising by heat convection. If the wind were blowing it is conceivable that the smoke could be blown back to the earth and thus affecting anyone who comes in contact with it.

Mr. Kirkmyer assumes that all the material received from his tank truck is burnable. He did note that he has had combustion problems because of water in the material which he estimated at 30 - 40%. The incinerator was not operable during this inspection.

There are 2 tank trucks parked just outside the LWD property. One truck was involved in an accident and is no longer used for liquid storage or

transportation. The other tanker, dark green in color, is being used as storage for industrial wastes.

The State of Virginia has required LWD to take certain action to comply with a zero discharge permit. Among the requirements is that a berm be constructed around the entire facility. At present a berm has been constructed around 3 sides of the facility. Mr. Kirkmyer indicated that the fourth side would be completed in the near future. The berm material appeared to be clay. An engineering firm has been hired to test the ground for percolation. The permit also required that rain water falling within the bermed area be collected and treated before being discharged.

cc: Thomas Voltaggio

Attachments (4)

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LIQUID WASTE DISPOSAL

Richmond, Virginia

April 8, 1980

<u>Sample #</u>	<u>Time</u>	<u>Location</u>
1		1/2 gallon of dark green tank truck - liquid sample
2		liquid sample of storage tank
2A		soil around furnace pump
3	1000	surface drainage - water sample (800409-03)
4	1010	soil behind furnace
5	1140	ditch below plant - water sample (800409-05)
6	1145	ditch above plant - water sample (800409-04)
7	1250	ditch below plant - sediment
8	1300	leaking drum just outside fence (800409-10)

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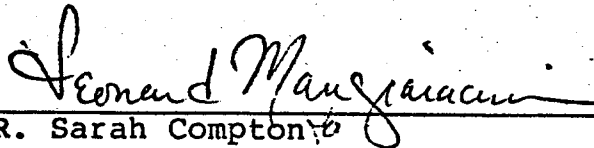
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III

Know by these presents that I, R. Sarah Compton, Director, Enforcement Division of Region III of the United States Environmental Protection Agency ("EPA"), hereby delegate the Inspection Authority of Section 11(a) of the Toxic Substances Control Act, 15 U.S.C. § 2610(a), to George Houghton of Surveillance & Analysis Annapolis Field Office and Ronald Jones of Surveillance & Analysis Annapolis Field Office, for the purpose of inspecting the Richmond, Virginia facility known as "Liquid Waste Disposal."

The aforesaid inspection authority was delegated from the EPA Administrator to the ten EPA Regional Administrators on July 28, 1978, and redelegated by the EPA Region III Regional Administrator to the Director, Enforcement Division, EPA, Region III.

MAR 13 1980

(Date)

  
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R. Sarah Compton  
Director, Enforcement Division  
EPA, Region III

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TSCA Notice of Inspection

U.S. Environmental Protection Agency  
NOTICE OF INSPECTION UNDER  
THE TOXIC SUBSTANCES CONTROL ACT

Name of Firm: "Liquid Waste  
Disposal"  
in  
Richmond, Virginia.

Date Inspection Commenced:

April 9 1980  
Hour: 0830

EPA Regional Office Address:  
6th & Walnut Street  
Philadelphia, Pa. 19106

Reason for Inspection

For the purpose of inspecting (including taking samples, photographs and other inspection activities) an establishment, facility, or other premises in which chemical substances or mixtures or articles containing same are manufactured, processed or stored, or held before or after their distribution in commerce (including records, files, papers, processes, controls, and facilities) in order to determine whether the requirements of the Act applicable to the chemical substances, mixtures or articles within or associated with such premises have been complied with.

Authority to Conduct Inspections

By authority of Section 11 of the Toxic Substances Control Act (15 USC § 2601) an authorized representative of the Administrator of the United States Environmental Protection Agency may enter and inspect, at reasonable times, any establishment facility, or other premises in which chemical substances or mixtures are manufactured, processed, stored, or held before or after their distribution in commerce and any conveyance used to transport chemical substances, mixtures, or such articles in connection with distribution in commerce.

Signature of Person  
Consenting to Inspection:

*[Signature]*

Signature of EPA Inspector(s):

*George Houghton* 4-9-80  
George Houghton  
DATE  
Surveillance & Analysis  
Annapolis Field Office  
Annapolis, Maryland

*Sec. Treasurer*  
TITLE

*Ronald Jones* 4-9-80  
Ronald Jones  
Surveillance & Analysis  
Annapolis Field Office  
Annapolis, Maryland

Distribution:

- one copy - Plant Manager
- one copy - PCB Violation Coordinator
- one copy - Inspector's files